

## Remarks

In response to the Office Action mailed October 13, 2005 (hereinafter "the 10/13/2005 Office Action"), claims 1, 7, 13, 19, and 25-28 are currently amended; no claims are cancelled or added. Accordingly, claims 1-28 are all of the claims pending in this application. In view of the foregoing amendments and the following remarks, allowance of all the claims pending in the application is anticipated.

### ***Rejection Under 35 U.S.C. § 102***

The Examiner has rejected claims 1-28 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Publication No. 2002/0010804 to Sanghvi *et al.* (hereinafter "Sanghvi"). Applicants traverse this rejection as legally improper at least because Sanghvi does not disclose each and every feature of the claimed invention.

For example, claim 1 recites, *inter alia*, "an event manager that receives the notification of the event from the event filter over the network, and disperses the event over the network." Independent claims 7, 13, and 19 include similar recitations, among other things.

The Examiner asserts that the event transformer of Sanghvi (shown in FIGS. 3 and 4 as event transformer 308, and described beginning at paragraph 39) is analogous to this claimed feature. Assuming, *arguendo*, that Sanghvi discloses that events may be received from a filter (filter 306 in FIG. 4), Sanghvi does not disclose that the event transformer and the filter communicate over a network. See Sanghvi at paragraph [0039]. Even if the filter 306 receives events from event sources over a network, filter 306 and event transformer 308 are disclosed as being components of a single processing module (e.g., WMI module 106 of FIGS. 1 and/or 2). See Sanghvi at, for example, paragraphs [0027] and [0030]-[0033]. Therefore, in Sanghvi, the event transformer is not the same as an event manager that receives the notification of the event from the event filter over the network, and disperses the event over the network. For at least this reason, the rejections of independent claims 1, 7, 13, and 19

are improper and must be withdrawn. Further, claims 2-6, 8-12, 14-18, and 20-28 depend from and add features to corresponding ones of claims 1, 7, 13, and 19. These claims are allowable over Sanghvi based on their dependency, as well as for the features that they add to the independent claims.

For example, claim 25 recites *inter alia*, "wherein the notification handler performs the second level filtering of notification of the event by determining whether contents of the event meet second level filtering criteria established by a user." Claims 26-28 include similar subject matter.

The Examiner alleges that filters 314, 320, 326, and 332 are analogous to notification handlers. The 10/13/2005 Office Action at page 4. Sanghvi expressly discloses that each of filters 314, 320, 326, and 332 is coupled to a corresponding event consumer 316, 322, 328, and 334, and that the filtering of events by filters 314, 320, 326, and 332 is based on the capabilities of the attached event consumer. Sanghvi at paragraphs [0048]-[0052]. The event consumers are defined as "an application that manages multiple storage devices in an enterprise." *Id.* at paragraph [0029]. Therefore, filters 314, 320, 326, and 332 are not the same as the claimed notification handler because filters 314, 320, 326, and 332 perform filtering based only on the characteristics of an attached application. They do not filter based on a filtering criteria established by a user. For at least this reason the rejection of claims 25-28 is improper and should be withdrawn.

**CONCLUSION**

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully submitted,

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